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Attorney for Defendant  
APPLE INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RAJA KANNAN,  
  
Plaintiff,  
  
v.  
  
APPLE INC.,  
  
Defendant.

Case No. 5:17-cv-07305-EJD (VKD)

**DECLARATION OF CAROLINE A.  
PHAM IN SUPPORT OF DEFENDANT  
APPLE INC.'S ADMINISTRATIVE  
MOTION FOR LEAVE TO FILE  
EXCESS PAGES FOR ITS MOTION  
FOR SUMMARY JUDGMENT**

Complaint Filed: December 26, 2017  
FAC Filed: May 10, 2018  
SAC Filed: October 19, 2018

1 I, Caroline A. Pham, declare:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of  
3 California and the United States District Court, Northern District of California. I am an attorney with  
4 the law firm of Baker McKenzie and counsel of record for Defendant Apple Inc. ("Apple") in the  
5 above captioned matter. I submit this declaration in connection with Apple's Administrative Motion  
6 for Leave to File Excess Pages for its Motion For Summary Judgment. I have personal knowledge  
7 of the facts set forth herein and, if called as a witness, could competently testify thereto.

8 2. On June 23, 2020, I emailed Plaintiff Raja Kannan asking him to stipulate to mutually  
9 increase the page limit for each parties' motion for summary judgment to thirty (30) pages. A true  
10 and correct copy of the email is attached hereto as **Exhibit A**.

11 3. To date, Plaintiff has not responded to my request to stipulate to mutually increase the  
12 page limit for each parties' motion for summary judgment to thirty (30) pages.

13 I declare under penalty of perjury under the laws of the United States and California that the  
14 foregoing is true and correct.

15 Executed this 25th day of June 2020 in San Francisco, California.

16  
17   
18 Caroline Pham

# **EXHIBIT A**

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**From:** Pham, Caroline  
**Sent:** Tuesday, June 23, 2020 3:52 PM  
**To:** Raja Kannan  
**Cc:** Boyer, Todd  
**Subject:** Kannan v. Apple - MSJ

Hi Raja,

Please let us know if you will stipulate to increase the page limit for each parties' motion for summary judgment to 30 pages, given that your Second Amended Complaint alleges 13 causes of action. This will also increase the page limit for any opposition to 30 pages as well.

In addition, we noticed that your portion of the Joint Trial Setting Conference Statement states that you will file a motion for an extension of time to file summary judgment or adjudication, and for an extension of time to respond to Apple's motion for summary judgment. As the parties will need to file their respective motions for summary judgment at the same time, please advise whether you will be seeking an extension and, if so, the length of the requested extension.

Best,  
Caroline

**Caroline Pham**

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